

UNITED STATE DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
MICHELLE CARTER

*Plaintiff,*

*-against-*

Case No.: 17-cv-539(AMD)(SLT)

JPMORGAN CHASE BANK, N.A.,

*Defendant.*

-----X  
JPMORGAN CHASE BANK, N.A.,

*Third-Party Plaintiff,*

*-against-*

DAHAEEL 1, INC. D/B/A ROCKAWAY FARM  
DELI & GRILL, SALEM N. AL-GEMSH, SALAH  
M. OMAIRAT, AMMAR Y. AWAWEH, 579  
ISLAND MARKET, INC. D/B/A BREAD AND  
BUTTER MARKET, YASER AWAWEH,  
MUHAMMED PRATTS, LAMONT ROBINSON,  
MOHAMMED KHATARI, PICKLES & OLIVES,  
INC., MAZEN DELI GROCERY CORP.  
KAMAL DARWISH, MUKHTER OMAIRAT,  
RANDY PRATTS, AGMED OMAIRAT,  
And "JOHN DOE NO. 1" to "JOH DOE NO. 10,"  
inclusive, the last ten names being fictitious and  
unknown to the third-party plaintiff,

**STIPULATION**

*Third-Party Defendants.*

-----X

***IT IS HEREBY STIPULATED*** by and between the attorneys for Third-Party Co-Defendant Cross-Claimants, SALAH M. OMAIRAT and MAZEN DELI GROCERY CORP. ("Third Party Cross-Claimants"), and the Third-Party Co-Defendants, MUKHTER OMAIRAT and PICKLES & OLIVES, INC. ("Replying Third Party Co-Defendants"), as follows:

***WHEREAS*** there have been no previous requests to enlarge the time for the Stipulating Replying Third-Party Co-Defendants to answer or otherwise move the Court with respect to the Cross-Claims of the Third Party Cross-Claimants which expired on March 10, 2018:

1. The Stipulating Replying Third Party Co-Defendants' time to answer or otherwise move the Court with respect to the Third Party Cross Claimants' cross claims (Docket No.: 56) is hereby extended up to and including the 22<sup>nd</sup> day of March, 2018.
2. The Third-Party Co-Defendants hereby waives any and all defenses based on lack of personal jurisdiction.
3. A faxed or electronic copy of a signature on this stipulation shall be deemed an original for all purposes.

Dated: New York, New York  
March 20, 2018

**MICHAEL T. SUCHER**


*Michael T. Sucher*

---

MICHAEL T. SUCHER, ESQ.  
*Attorney for Third Party Cross-Claimants*

SALAH M. OMAIRAT and MAZEN  
DELI GROCERY CORP.  
26 Court Street, Suite 2412  
Brooklyn, New York 11242  
T: 718-522-1995  
F: 718-797-3174  
E: [nylawer@aol.com](mailto:nylawer@aol.com)

**THE VOLAKOS LAW FIRM, P.C.**



---

KONSTANTINOS VOLAKOS, ESQ.  
*Attorney for Replying Third-Party Co-Defendant*

MUKHTER OMAIRAT and  
PICKLES & OLIVES, INC.  
120 Bay Ridge Avenue  
Brooklyn, New York 11220  
T: 718-836-4800  
F: 646-304-2854  
E: [volakosesq@volakoslaw.com](mailto:volakosesq@volakoslaw.com)

SO ORDERED:

---